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23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
TIME FOR PLAINTIFF TO RESPOND
TO DEFENDANTS’ OBJECTIONS TO
THE UNITED STATES MAGISTRATE
JUDGE’S ORDER AND REPORT AND
RECOMMENDATION**

(SECOND REQUEST)

1 The parties, by and through their respective counsel, hereby stipulate to permit Plaintiff
 2 an additional 1 business day, or until March 8, 2021, to respond to Defendants' Objections to
 3 the United States Magistrate Judge's January 15, 2021 Order and Report and Recommendation.
 4 This is the parties' second request related to the matters set forth herein. The parties
 5 respectfully request that the Court approve this Stipulation. In support of this Stipulation, the
 6 parties rely upon the facts set forth below.

7 The United States Magistrate Judge assigned to this matter issued an Order and a Report
 8 and Recommendation ("Report") on January 15, 2021. ECF No. 117. Defendants filed an
 9 Objection to that Report on February 12, 2021. ECF No. 121. Pursuant to this Court's Local
 10 Rules of Civil Practice, Plaintiff is permitted a response to the Objection filed by Defendants.
 11 Plaintiff's current deadline for filing that response is March 5, 2021. Undersigned counsel,
 12 however, has notified undersigned defense counsel that while he has substantially completed a
 13 response to the Defendants' Objection (ECF No. 121), he needs additional time to have his co-
 14 counsel review and approve the filing. Additionally, undersigned counsel for Plaintiff was only
 15 recently able to obtain an appointment today for the COVID vaccine and will need to leave the
 16 office to receive that. In light of the foregoing, the parties stipulate and agree that good cause
 17 supports this request for a 1 business day extension of time.

18 For the reasons set forth above, the parties respectfully approve this Stipulation and
 19 permit Plaintiff to file a response to Defendants' Objections on or before March 8, 2021.

20 /s/ Kris Leonhardt

/s/ Paul S. Padda

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 22 _____
 23 Pavneet S. Uppal, Esq.
 24 Kris Leonhardt, Esq.
 25 Brian L. Bradford, Esq.

21
 22 _____
 23 Kathleen Bliss, Esq.
 24 Paul S. Padda, Esq.
 25 David Stander, Esq.
 26 Douglass A. Mitchell, Esq.

27 *Counsel for Defendants*

*Counsel for Christi El-Meligi,
 Netrishia Dalgai and Navajo Health
 Foundation – Sage Memorial
 Hospital, Inc.*

28 Dated: March 5, 2021

Dated: March 5, 2021

IT IS SO ORDERED.



U.S. MAGISTRATE JUDGE

Dated: March 5, 2021